

# **EXHIBIT F**

**Jared Pliner**

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**From:** Jeff Goldman  
**Sent:** Monday, June 29, 2020 2:30 PM  
**To:** denis.riordan@dhs.gov; Kristen Smith (Kristen.Smith@uscis.dhs.gov)  
**Cc:** Michael J. McCleary (Michael.J.McCleary@uscis.dhs.gov); Kasia Loor; Jared Pliner  
**Subject:** Cintia Karen Crespo Barbosa, A204187613; Carlos Henrique Barbosa, A214687095  
**Attachments:** Barbosa Mandamus Draft.docx

Dear Denis and Kristen,

I do not know where to turn with these two long-overdue pending cases in Lawrence, so I am emailing you. My law firm's Form G-28 is in your file. I am attaching a draft of our Writ of Mandamus which will be filed in Federal Court one week from today if we do not have a response by then. I am sending this as a courtesy as you are both named as Defendants.

Our clients, Cintia Karen Crespo Barbosa (A204-187-613) and her husband, Carlos Henrique Barbosa (A214-687-095), attended their Adjustment of Status interviews 18 months ago in Lawrence and have still not received a decision on their applications. In April of 2019, we received a NOID questioning her 245(i) eligibility, and we promptly responded with the evidence from the Post Office proving 245(i) eligibility, and this should no longer be a concern. It has been over a year even since the NOID response was filed. Since that date, their priority date has gone from current, to backlogged, to current again.

The petitioner for the approved I-140 is Spaulding Rehabilitation Hospital, where Ms. Barbosa is a highly-acclaimed nurse currently assisting patients with COVID-19.

The two cases do have some mildly-unique issues in that Ms. Barbosa is currently inside the United States under DACA, and is Adjusting Status under 245(i), but these matters should have been reviewed and approved of either at the interview or shortly after we responded to the NOID more than a year ago.

We have lodged service requests and have repeatedly reached out to Lawrence to no avail.

Ms. Barbosa is a nurse who has managed patients' care with compassion and dedication. She is currently risking her life by assisting in the treatment of COVID-19. The US government owes her at minimum to make a decision whether she could stay in the country for which she has given so much.

Thank you for your assistance.

Best,  
Jeff

Jeff Goldman  
Direct: 978.219.5055  
Email: [jeff@jeffgoldmanimmigration.com](mailto:jeff@jeffgoldmanimmigration.com)

**Jeff  
Goldman  
IMMIGRATION**

*Massachusetts Office*  
**Cambridge Innovation Center**  
One Broadway (Kendall  
Square)  
Cambridge, MA 02142  
Phone: 978.219.5040  
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*California Office*  
**Bovet Professional  
Center**  
155 Bovet Road, Suite 302  
San Mateo, CA 94402  
Phone: 650.293.0900  
Fax: 650-523-4387

*All written correspondence to:*  
**Jeff Goldman Immigration LLP**  
125 Washington Street, Suite 204

**[www.jeffgoldmanimmigration.com](http://www.jeffgoldmanimmigration.com)**

**Jeff  
Goldman**  
IMMIGRATION

VIA FEDERAL EXPRESS

May 27, 2020

USCIS Office Director  
Lawrence Field Office  
ATTN: Adjustment of Status Adjudications  
2 Mill Street  
Lawrence, MA 01840

**RE: I-485, Applications for Adjustment of Status**

**Principal Applicant: Cintia Karen Crespo BARBOSA (A204-187-613)**  
**Receipt Number: SRC-18-900-55093**

**Derivative Applicant: Carlos Henrique BARBOSA (A214 687 095)**  
**Receipt Number: SRC-18-900-55090**

Dear Director,

I represent Mrs. and Mr. Barbosa with the above-captioned matter. My G-28s have previously been submitted.

On February 19, 2019, Mrs. and Mr. Barbosa were interviewed at your office in reference to their I-485, Applications to Register Permanent Residence or Adjust Status. However, as of today, there have been no decisions regarding these applications.

**Please note that as of June 1, 2020, Mrs. Barbosa's priority date in the Employment-Based category worldwide (August 14, 2017) will be current again and her case as well as her husband's case can be approved. See the attached I-140 approval notice.**

**We hereby respectfully request that favorable decisions are issued in these cases immediately after June 1, 2020 and no later than June 14, 2020. While we hope we won't need to do this, we are prepared to take further legal action if the case is not approved by the date listed above.** Thank you in advance for your prompt attention to this request.

Very truly yours,



Katarzyna Loor, Esq.

Enclosure

Cambridge Innovation Center  
One Broadway (Kendall Square)  
Cambridge, MA 02142  
TEL: 978.219.5040  
FAX: 617.977.0928

Bovet Professional Center  
155 Bovet Road, Suite 302  
San Mateo, CA 94402  
TEL: 650.293.0900  
FAX: 650.523.4387

*All correspondence goes to:*  
Jeff Goldman Immigration  
125 Washington Street  
Suite 204  
Salem, MA 01970

**Jeff Goldman Immigration**  
[www.jeffgoldmanimmigration.com](http://www.jeffgoldmanimmigration.com)

ORIGIN ID: EWBA (978) 219-5040 JEFFREY GOLDMAN LAW OFFICES OF JEFF GOLDMAN LLP 125 WASHINGTON STREET SUITE 204 SALEM, MA 01970 UNITED STATES US	SHIP DATE: 28MAY20 ACTWGT: 1.00 LB CAD: 102992746INET4220 BILL SENDER
TO AOS ADJUDICATIONS USCIS: LAWRENCE FIELD OFFICE 2 MILL STREET LAWRENCE MA 01840 (978) 219-5040 REF: LETTER FOR CNTA DEPT.	
 	
TRK# 7705 6735 5130 0201 03 BMLA MA-US MHT 01840	FRI - 29 MAY 3:00P STANDARD OVERNIGHT
	

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**Jared Pliner**

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**From:** USCIS <USCIS-CaseStatus@dhs.gov>  
**Sent:** Monday, December 16, 2019 11:58 AM  
**To:** Martha Ellis  
**Subject:** Your recent inquiry (receipt #SRC-18-900-55093)

U.S. Department of Homeland Security  
2 Mill Street  
Lawrence, MA 01840

U.S. Citizenship and Immigration Services  
Monday, December 16, 2019

Emailed to martha@jeffgoldmanimmigration.com

Dear Cintia Barbosa:

On 12/05/2019, you or the designated representative shown below, contacted us about your case. Some of the key information given to us at that time was the following:

Person who contacted us:

-- Loor, Katarzyna

Caller indicated they are:

-- Attorney or Authorized Representative

Attorney Name:

-- LOOR, KATARZYNA

Case type:

-- I485

Filing date:

-- 10/17/2017

Receipt #:

-- SRC-18-900-55093

Referral ID:

SR13391904326TSC

Beneficiary (if you filed for someone else):

-- Information not available

Your USCIS Account Number (A-number):

-- 204187613

Type of service requested:

-- Non-Delivery of Approval Notice

The status of this service request is:

On 12/05/2019, you or your representative contacted us concerning your I-485 Form, Application to Register as a Permanent Resident or Adjust Status to request an update on the status of your case. Below is a summary of what we found and how the issue has been or may be resolved.

Based on your inquiry, we have reviewed the status of your case and found that it remains under active examination. This office acknowledges the completion of your case being outside of the normal processing and realizes the inconvenience it may cause. The delay has been necessary in order to ensure the thorough processing of your case and provide you with the best possible service. USCIS will notify you as soon as possible if any further information is needed from you, or when a decision has been made.

We hope this information is helpful and appreciate your continued patience.

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#### Online Services

We offer many online services and tools to help you find the information you need. Please visit our Web site at [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.uscis.gov&d=DwICAw&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A\\_Cdp gnVfiiMM&r=YZq9qYkNMT46XINVl6DxDqN-m3Ql7hOBfrV46Z-vBv6nnITso6zQ9iSGWASOo60l&m=dMbm nODscQfWRgHoy9HaavmPiJOWwKENe-37EMkN6rI&s=Lyd4J2fpE-ZLFmH96pK3yGAreTIY7C1ZUVD2zcsIRWQ&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.uscis.gov&d=DwICAw&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=YZq9qYkNMT46XINVl6DxDqN-m3Ql7hOBfrV46Z-vBv6nnITso6zQ9iSGWASOo60l&m=dMbm nODscQfWRgHoy9HaavmPiJOWwKENe-37EMkN6rI&s=Lyd4J2fpE-ZLFmH96pK3yGAreTIY7C1ZUVD2zcsIRWQ&e=) for information about:

- Using our Case Status Online tool;
- Signing up for case status updates;
- Checking processing times;
- Submitting an e-Request to inquire about certain applications and petitions;
- Using our Office Locator;
- Using InfoPass to schedule an appointment; and
- Downloading forms.

#### Address Changes

If you move, please provide us with an updated address. For more information about address changes, please visit our Web site at [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.uscis.gov\\_ar-2D11&d=DwICAw&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A\\_Cdp gnVfiiMM&r=YZq9qYkNMT46XINVl6DxDqN-m3Ql7hOBfrV46Z-vBv6nnITso6zQ9iSGWASOo60l&m=dMbm nODscQfWRgHoy9HaavmPiJOWwKENe-37EMkN6rI&s=dxTFkvSVxl gPxgpZ5XsXB iCGwCMIMXs1sVZyvt8xa8&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.uscis.gov_ar-2D11&d=DwICAw&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=YZq9qYkNMT46XINVl6DxDqN-m3Ql7hOBfrV46Z-vBv6nnITso6zQ9iSGWASOo60l&m=dMbm nODscQfWRgHoy9HaavmPiJOWwKENe-37EMkN6rI&s=dxTFkvSVxl gPxgpZ5XsXB iCGwCMIMXs1sVZyvt8xa8&e=), and click on ?Change Your Address Online.?

#### For More Information

If you do not find the information you need through our online services and need further assistance, you may contact our National Customer Service Center at 1-800-375-5283 or 1-800-767-1833 (TDD for the hearing impaired).

**Jeff  
Goldman  
IMMIGRATION**

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VIA FEDERAL EXPRESS

September 26, 2019

U. S. Citizenship and Immigration Services  
Lawrence Field Office  
ATTN: Adjustment of Status Adjudications  
2 Mill Street  
Lawrence, MA 01840

**RE: I-485, Application for Adjustment of Status**  
**Receipt Number: SRC-18-900-55093**  
**Applicant: Cintia Karen Crespo BARBOSA (204-187-613)**

Dear Sir or Madam:

I represent Ms. Barbosa with the above-captioned matter. My G-28 has previously been submitted.

On February 19, 2019, Ms. Barbosa was interviewed at your office in reference to her I-485, Application to Register Permanent Residence or Adjust Status. However, as of today, there has been no decision regarding this application.

We hereby respectfully request that a favorable decision is issued on this case as soon as possible. Ms. Barbosa's priority date of August 14, 2017 under the Employment-Based Third Preference Category (EB-3) for Brazil will be current in October of this year. Please find enclosed a copy of the I-140 approval notice for your easy reference.

Thank you in advance for your prompt attention to this request.

Very truly yours,



Katarzyna Loor, Esq.

KL/me  
Enclosures

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Cambridge Innovation Center  
One Broadway (Kendall Square)  
Cambridge, MA 02142  
TEL: 978.219.5040  
FAX: 617.977.0928

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TEL: 650.293.0900  
FAX: 650.523.4387

*All correspondence goes to:*  
Jeff Goldman Immigration  
125 Washington Street  
Suite 204  
Salem, MA 01970

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